

Exhibit A

GALEX WOLF, LLC  
Attorneys at Law  
1520 U.S. Hwy. 130 – Suite 101  
North Brunswick, NJ 08902  
(732) 257-0550 – PHONE  
(732) 257-5654 – FAX  
Attorneys for Plaintiffs

MARJORIE CHULSKY, on behalf of herself  
and those similarly situated,

Plaintiff,

v.

HUDSON LAW OFFICES, P.C.; Laurie A,  
Hudson a/k/a Laurie A. Hudson, Esq.; and John  
Does 1 to 10,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
MONMOUTH COUNTY – LAW DIVISION

CIVIL ACTION

Docket No.: MON-L-002424-10

SUMMONS

The State of New Jersey, to the Named Defendant: HUDSON LAW OFFICES, P.C.

The Plaintiff(s), named above, have filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each Deputy Clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee payable to the Clerk of Superior Court and a completed Case Information Statement (available from the Deputy Clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee of \$135.00 for Law Division and \$135.00 for Chancery Division and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford to pay an attorney, you may call the Legal Services Office in the county where you live. A list of these offices is provided. If you do not have an attorney or are



not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: June 4, 2010

/s/ Jennifer M. Perez

Jennifer M. Perez

Clerk of the Superior Court of New Jersey

*Name of defendant to be served:*

HUDSON LAW OFFICES, P.C.

*Address for service:*

900 Route 168, Suite C-2  
Turnersville, NJ 08012  
(Via Guaranteed Subpoena)



**ATLANTIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Direct Filing  
1201 Bacharach Blvd., 1<sup>st</sup> Floor  
Atlantic City, NJ 08401  
LAWYER REFERRAL  
(609) 345-3444  
LEGAL SERVICES  
(609) 348-4200

**BERGEN COUNTY:**

Deputy Clerk of the Superior Court  
Case Processing Section, Room 119  
Justice Center  
10 Main Street  
Hackensack, NJ 07601-0769  
LAWYER REFERRAL  
(201) 488-0044  
LEGAL SERVICES  
(201) 487-2186

**BURLINGTON COUNTY:**

Deputy Clerk of the Superior Court  
Central Processing Office  
Attn: Judicial Intake  
1<sup>st</sup> Floor, Courts Facility  
48 Rancocas Road  
Mt. Holly, NJ 08060  
LAWYER REFERRAL  
(609) 281-4882  
LEGAL SERVICES  
(609) 281-1088

**CAMDEN COUNTY:**

Deputy Clerk of the Superior Court  
Civil Processing Office  
1<sup>st</sup> Floor, Hall of Records  
101 South Fifth Street  
Camden, NJ 08103  
LAWYER REFERRAL  
(856) 984-4320  
LEGAL SERVICES  
(856) 984-2010

**CAPE MAY COUNTY:**

Deputy Clerk of the Superior Court  
Central Processing Office  
9 North Main Street  
Box DN-208  
Cape May Court House, NJ 08210  
LAWYER REFERRAL  
(609) 463-0313  
LEGAL SERVICES  
(609) 465-3001

**CUMBERLAND COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Broad & Fayette Streets, P.O. Box 815  
Bridgeton, NJ 08302  
LAWYER REFERRAL  
(856) 692-6207  
LEGAL SERVICES  
(856) 461-0003

**ESSEX COUNTY:**

Deputy Clerk of the Superior Court  
50 West Market Street  
Room 131  
Newark, NJ 07102  
LAWYER REFERRAL  
(973) 622-6207  
LEGAL SERVICES  
(973) 624-4500

**GLOUCESTER COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office, Attn: Intake  
1<sup>st</sup> Floor, Court House  
1 North Broad Street, P.O. Box 128  
Woodbury, NJ 08090  
LAWYER REFERRAL  
(856) 848-4689  
LEGAL SERVICES  
(856) 848-5360

**HUDSON COUNTY:**

Deputy Clerk of the Superior Court  
Superior Court, Civil Records Department  
Brennan Court House, 1<sup>st</sup> Floor  
583 Newark Avenue  
Jersey City, NJ 07306  
LAWYER REFERRAL  
(201) 788-2727  
LEGAL SERVICES  
(201) 782-6363

**HUNTERDON COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
65 Park Avenue  
Flemington, NJ 08862  
LAWYER REFERRAL  
(908) 735-2611  
LEGAL SERVICES  
(908) 762-7979

**MERCER COUNTY:**

Deputy Clerk of the Superior Court  
Local Filing Office, Courthouse  
175 South Broad Street  
P.O. Box 8088  
Trenton, NJ 08650  
LAWYER REFERRAL  
(609) 855-6200  
LEGAL SERVICES  
(609) 859-6249  
MIDDLESEX COUNTY:  
Deputy Clerk of the Superior Court  
Administration Building  
3<sup>rd</sup> Floor  
1 Kennedy Square, P.O. Box 2633  
New Brunswick, NJ 08903-2633  
LAWYER REFERRAL  
(732) 828-0063  
LEGAL SERVICES  
(732) 249-7600

**MONMOUTH COUNTY:**

Deputy Clerk of the Superior Court  
Court House, 71 Monument Park  
P.O. Box 1259  
Freehold, NJ 07728-1259  
LAWYER REFERRAL  
(732) 431-5644  
LEGAL SERVICES  
(732) 666-0020  
MORRIS COUNTY:  
Deputy Clerk of the Superior Court  
Civil Division  
30 Schuyler Place, P.O. Box 910  
Morristown, NJ 07960-0910  
LAWYER REFERRAL  
(973) 267-5882  
LEGAL SERVICES  
(973) 285-6911

**OCEAN COUNTY:**

Deputy Clerk of the Superior Court  
Court House, Room 119  
118 Washington Street  
Toms River, NJ 08754  
LAWYER REFERRAL  
(732) 240-3666  
LEGAL SERVICES  
(732) 341-2727

**PASSAIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
Court House  
77 Hamilton Street  
Paterson, NJ 07605  
LAWYER REFERRAL  
(973) 278-9223  
LEGAL SERVICES  
(973) 345-7171

**SALEM COUNTY:**

Deputy Clerk of the Superior Court  
92 Market Street  
P.O. Box 18  
Salem, NJ 08079  
LAWYER REFERRAL  
(856) 936-6928  
LEGAL SERVICES  
(856) 451-0003

**SOMERSET COUNTY:**




Deputy Clerk of the Superior Court  
Civil Division Office  
New Court House, 3<sup>rd</sup> Floor  
P.O. Box 3000  
Somerville, NJ 08878  
LAWYER REFERRAL  
(908) 685-2323  
LEGAL SERVICES  
(908) 231-0640  
SUSSEX COUNTY:  
Deputy Clerk of the Superior Court  
Sussex County Judicial Center  
43-47 High Street  
Newton, NJ 07860  
LAWYER REFERRAL  
(973) 267-5582  
LEGAL SERVICES  
(973) 383-7400

**UNION COUNTY:**

Deputy Clerk of the Superior Court  
1<sup>st</sup> Floor, Court House  
2 Broad Street  
Elizabeth, NJ 07207-6073  
LAWYER REFERRAL  
(908) 353-4716  
LEGAL SERVICES  
(908) 354-4340  
WARREN COUNTY:  
Deputy Clerk of the Superior Court  
Civil Division Office  
Court House, 418 Second Street  
Belvidere, NJ 07823-1500  
LAWYER REFERRAL  
(973) 287-6882  
LEGAL SERVICES  
(973) 476-2010



## Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLETS SERVICE ONLY	
 <p>Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or if attorney's signature is not affixed.</p>		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. AMOUNT: OVERPAYMENT: BATCH NUMBER:	
ATTORNEY/PRO SE NAME Andrew R. Wolf, Esq.	TELEPHONE NUMBER (732) 257-0550	COUNTY OF VENUE Middlesex	
FIRM NAME (if applicable) Galax Wolf, LLC		DOCKET NUMBER (When available)	
OFFICE ADDRESS 1520 US Highway 130 Suite 101 North Brunswick, NJ 08902		DOCUMENT TYPE Class Action Complaint	
		JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
NAME OF PARTY (e.g., John Doe, Plaintiff) Marjorie Chulsky, on behalf of herself and those similarly situated, PLAINTIFF	CAPTION Marjorie Chulsky, on behalf of herself and those similarly situated vs. Hudson Law Offices, P.C.; Lauri A. Hudson a/k/a Lauri A. Hudson, Esq.; and John Does 1 to 10		
CASE TYPE NUMBER (See reverse side for listing) 508 COMPLEX COMMERCIAL	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	IF YES, LIST DOCKET NUMBERS MON-8C-989-10		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY, IF KNOWN <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, IS THAT RELATIONSHIP <input type="checkbox"/> EMPLOYER-EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION:  Plaintiff brings this action on behalf of herself and others similarly situated for damages, and for injunctive, declaratory and other relief arising from the Defendants' violations of § 1692 et seq. of Title 15 of the United States Code, the Fair Debt Collection Practices Act (hereinafter, FDCPA), the New Jersey Consumer Fraud Act (N.J.S.A. 56:8-2 et seq.) (hereinafter, CFA) and the New Jersey Truth-in-Consumer Contract Warranty and Notice Act (N.J.S.A. 56:12-14 et seq.) (hereinafter, TCCWNA).			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION:		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IF YES, FOR WHAT LANGUAGE:		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: 			





SIDE 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I — 160 days' discovery**

- 151 NAME CHANGE
- 176 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (INCLUDING DECLARATORY JUDGMENT ACTIONS)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (SUMMARY ACTION)
- 899 OTHER (Briefly describe nature of action)

**Track II — 300 days' discovery**

- 305 CONSTRUCTION
- 508 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603 AUTO NEGLIGENCE — PERSONAL INJURY
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE — PROPERTY DAMAGE
- 699 TORT — OTHER

**Track III — 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES
- 620 FALSE CLAIMS ACT

**Track IV — Active Case Management by Individual Judge / 450 days' discovery**

- 153 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 608 COMPLEX COMMERCIAL
- 613 COMPLEX CONSTRUCTION
- 614 INSURANCE FRAUD
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Centrally Managed Litigation (Track IV)**

- 280 Zelnorm
- 285 Stryker Trident Hip Implants

**Mass Tort (Track IV)**

- |                                       |                                        |
|---------------------------------------|----------------------------------------|
| 245 CIBA GEIGY                        | 279 GADOLINIUM                         |
| 268 HORMONE REPLACEMENT THERAPY (HRT) | 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL |
| 271 ACCUTANE                          | 282 FOSAMAX                            |
| 272 BEXTRA/CELEBREX                   | 283 DIGITEK                            |
| 274 RISPERDAL/SEROQUEL/ZYPREXA        | 284 NUVARING                           |
| 275 ORTHO EVRA                        | 286 LEVAQUIN                           |
| 277 MAHWAH TOXIC DUMP SITE            | 601 ASBESTOS                           |
| 278 ZOMETHA/ARELIA                    | 619 VIOXX                              |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category:

☐ Verbal Threshold

☒ Putative Class Action

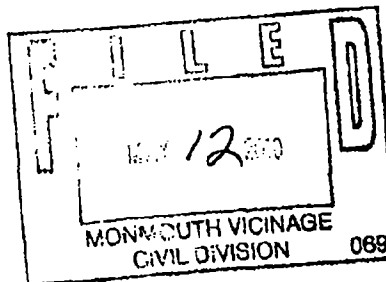
☐ Title 59



Andrew R. Wolf, Esq.  
Galex Wolf, LLC  
1520 U.S. Highway 130 - Suite 101  
North Brunswick, NJ 08902  
(732) 257-0550 - tel  
(732) 257-5654 - fax

Christopher J. McGinn  
The Law Office of Christopher J. McGinn  
P.O. Box 365  
79 Paterson St.  
New Brunswick, NJ 08901  
(732) 937-9400 - tel  
(800) 931-2408 - fax

*Attorneys for Plaintiff on behalf of herself  
and those similarly situated*



Marjorie Chulsky, on behalf of herself and  
those similarly situated,

Plaintiffs,

vs.

Hudson Law Offices, P.C.; Lauri A.  
Hudson a/k/a Lauri A. Hudson, Esq.; and  
John Does 1 to 10,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
MONMOUTH COUNTY - LAW DIVISION

Civil Action

Docket No. L2424-10

CLASS ACTION COMPLAINT  
AND JURY DEMAND

**NATURE OF THE ACTION**

1. Plaintiff was sued in Small Claims Court by Defendant Hudson Law Offices, P.C., a professional service corporation that was organized to engage in the practice of law. The law firm had purchased an alleged consumer debt of Plaintiff and has engaged in efforts to collect the debt which it owns, including the filing of law suits in New Jersey Courts.

2. New Jersey law (N.J.S.A. 14A:17-1 et. seq.) makes it unlawful for a law firm organized as a professional service corporation to engage in such ultra vires activities as buying consumer debt and attempting to collect consumer debt. Plaintiff brings this action on behalf of

herself and others similarly situated for damages, and for injunctive, declaratory and other relief arising from the Defendants' violations of § 1692 et seq. of Title 15 of the United States Code, the Fair Debt Collection Practices Act (hereinafter, FDCPA), the New Jersey Consumer Fraud Act (N.J.S.A. 56:8-2 et seq.) (hereinafter, CFA) and the New Jersey Truth-in-Consumer Contract Warranty and Notice Act (N.J.S.A. 56:12-14 et seq.) (hereinafter, TCCWNA).

#### **JURISDICTION AND VENUE**

3. This Court has jurisdiction over this matter alleging violations of the FDCPA, 15 U.S.C. § 1692 et seq. pursuant to 15 U.S.C. § 1692k(d).

4. Venue in this action properly lies in Monmouth County as that is the location where Plaintiff resides and where Defendants transact business.

#### **PARTIES**

5. Plaintiff Marjorie Chulsky (hereinafter, Chulsky or Plaintiff) resides in Long Branch, New Jersey.

6. Hudson Law Offices, P.C. (hereinafter, HLO) is a law firm, with an office in Turnersville, New Jersey.

7. Lauri A. Hudson a/k/a Lauri A. Hudson, Esq. (hereinafter, Hudson) is a principal and/or owner of HLO.

8. Hudson personally authorized and/or engaged in the conduct described herein.

9. Defendants refers to Hudson and HLO.

10. Defendants John Does 1 to 10 are fictitious names of individuals and businesses alleged for the purpose of substituting names of defendants whose identity will be disclosed in discovery and should be made parties to this action.

**ALLEGATIONS OF FACT**

Plaintiff Marjorie Chulsky says:

11. HLO is organized as a professional service corporation with the New Jersey Secretary of State.
12. In its filing with the Secretary of State, HLO identified its purpose as the practice of law.
13. The New Jersey statute concerning professional service corporations (at N.J.S.A. 14A:17-9) prohibits a professional service corporation from engaging in any business other than the rendering of the professional services for which it was specifically incorporated.
14. At all times relevant to this matter, HLO has been engaged in a business which includes the purchasing of consumer debt.
15. At all times relevant to this matter, HLO has been engaged in the business of purchasing charged-off and/or delinquent credit card accounts and other consumer debts.
16. Hudson had knowledge of HLO's purchases of consumer debt at the time the debts were purchased.
17. Hudson authorized and/or approved HLO's purchases of consumer debt at the time the debts were purchased.
18. Hudson was personally involved in HLO's purchases of consumer debts.
19. HLO has attempted to collect on these purchased consumer debts in its own name, including filing lawsuits in its name in the Superior Court of New Jersey.
20. Hudson had knowledge of HLO's efforts to collect on these purchased consumer debts and the filing of lawsuits in the New Jersey Superior Court as part of that process.

21. Hudson authorized and/or approved of HLO's efforts to collect on these purchased consumer debts and the filing of lawsuits in the New Jersey Superior Court as part of that process.

22. Hudson was personally involved in HLO's efforts to collect on these purchased consumer debts and the filing of lawsuits in the New Jersey Superior Court as part of that process.

23. Hudson signed the complaints on behalf of HLO related to the lawsuits that HLO filed in New Jersey Superior Court.

24. HLO filed a complaint on March 26, 2010 with the Superior Court of New Jersey, Law Division, Special Civil Part, Small Claims in Monmouth County, New Jersey against Chulsky, a copy of the Complaint is attached as Exhibit A.

25. Hudson signed the complaint that HLO filed against Chulsky.

26. In the complaint, HLO claimed it was a successor in interest to First Bank of Delaware -- a credit card provider.

27. The complaint listed HLO as the Plaintiff and alleged that Chulsky was liable to HLO in the amount of \$1,194.72.

28. HLO claims it purchased the alleged debt from Credit Solutions, Corp.

29. Defendants filed complaints where "Hudson Law Offices, P.C." was identified as the Plaintiff against more than 100 consumers within the State of New Jersey attempting to collect on accounts it purchased within the period beginning on the day one year prior to the date this complaint is filed to the present.

30. The complaints filed by Hudson on behalf of HLO against Plaintiff and others similarly situated would cause them to be confused, misled or deceived about character or legal status of the alleged debts in violation of FDCPA under the "least sophisticated consumer" standard.

31. Defendants knew or should have known that their actions violated the FDCPA. Additionally, Defendants could have taken the steps necessary to bring their actions within compliance with the FDCPA, but neglected to do so and failed to adequately review their actions to ensure compliance with the law.

32. HLO's purchase of consumer debt is an unlawful act.

33. HLO's collection of debt owned by HLO is an unlawful act.

34. Defendants regularly collect or attempt to collect debts due or alleged to be due.

35. Defendants regularly collect or attempt to collect consumer debts owed or due or asserted to be owed or due.

36. Defendants regularly collect or attempt to collect debts owed or due or asserted to be owed or due, which debts were incurred primarily for personal, family or household purposes.

37. Defendants use the mail, telephone or other instruments of interstate commerce in their attempts to collect debts due or alleged to be due.

38. Defendants use the mail, telephone or other instruments of interstate commerce in their attempts to collect consumer debts owed or due or asserted to be owed or due.

39. Defendants use the mail, telephone or other instruments of interstate commerce in their attempts to collect debts owed or due or asserted to be owed or due, which debts were incurred primarily for personal, family or household purposes.

40. Hudson is a "debt collector" within the scope of the definition contained in 15 U.S.C. § 1692a(6) and interpretations thereof.

41. HLO is a "debt collector" within the scope of the definition contained in 15 U.S.C. § 1692a(6) and interpretations thereof.



42. Chulsky is a "consumer" as defined by 15 U.S.C. § 1692a(3) of the FDCPA.

43. The debt alleged to be owed by Plaintiff and others similarly situated are consumer debts.

44. Plaintiff and others similarly situated are consumers as they are natural persons allegedly obligated to pay a debt, in which the money, property, insurance, or services, which was the subject of the transaction, was primarily for personal, family and/or household purposes.

#### CLASS ACTION ALLEGATIONS

45. This action is brought and may properly proceed as a class action, pursuant to the provisions of Rule 4:32 of the New Jersey Court Rules. Plaintiff brings this action on behalf of herself and others similarly situated. The Class is initially defined as follows:

All New Jersey consumers against whom HLO and/or Hudson filed a complaint on behalf of Hudson Law Offices, P.C., or otherwise attempted to collect a debt owned by HLO within the appropriate statutory period.

The class may be subsequently refined. Specifically excluded from this class is any entity in which any Defendant has a controlling interest, and the officers, directors, employees, affiliates, subsidiaries, legal representatives, heirs, successors and their assigns of any entity, together with any immediate family member of any officer, director or employee of such entity. Also excluded from the Class is any Judge presiding over this Action and members of their immediate families.

46. Plaintiff seeks to recover statutory damages, attorney's fees and costs on behalf of all class members under the federal Fair Debt Collection Practices Act (FDCPA), The New Jersey Consumer Fraud Act (CFA) and the New Jersey Truth-in-Consumer Contract Warranty and Notice Act (TCCWNA).

47. The Class for whose benefit this action is brought is so numerous that joinder of all members is impracticable.

48. There are questions of law and fact common to the members of the Class that predominate over questions affecting only individuals. These common questions include, but are not limited to:

- A. Whether Plaintiff and the Class have sustained damages and are entitled to restitution as a result of Defendants' wrongdoing and, if so what is the proper measure and appropriate statutory formula to be applied in determining such damages and restitution;
- B. Whether Plaintiff and the Class have been injured by the Defendants' conduct;
- C. Whether Defendants violated the FDCPA by engaging in a business outside of business that it was organized to engage in or allowed by law to engage in;
- D. Whether Defendants violated various provisions of the FDCPA, including but not limited to: 15 U.S.C. § 1692e; 15 U.S.C. § 1692e(2)(A); and 15 U.S.C. § 1692e(10);
- E. Whether Defendants violated the CFA by engaging in a business outside of the business that it was organized to engage in or allowed by law to engage in;
- F. Whether Plaintiff suffered an ascertainable loss entitling her and members of the class to treble damages under the CFA;
- G. Whether Plaintiff and the Class are entitled to declaratory relief and/or injunctive relief;
- H. Whether the Complaints filed by Defendants against Plaintiff and members of the class are Notices as contemplated by TCCWNA; and
- I. Whether Defendants violated the TCCWNA by filing complaints against consumers to collect debts that they could not lawfully collect by engaging in a business outside of business that it was organized to engage in or allowed by law to engage in.

49. A class action is superior to other available methods for the fair and efficient adjudication of this controversy since joinder of all members is impracticable. A class action will cause an orderly and expeditious administration of the claims of the Class and will foster economies of time, effort and expense.

50. The claims of the Plaintiff are typical of the claims of the members of the Class.
51. The questions of law and/or fact common to the members of the Class predominate over any questions affecting only individual members.
52. Plaintiff does not have interests antagonistic to those of the Class.
53. The Class, of which Plaintiff is a member, is readily identifiable.
54. Plaintiff will fairly and adequately protect the interests of the Class, and has retained competent counsel experienced in the prosecution of consumer litigation. Proposed Class Counsel have investigated and identified potential claims in the action; have a great deal of experience in handling class actions, other complex litigation, and claims of the type asserted in this action.
55. The prosecution of separate actions by individual members of the Class would run the risk of inconsistent or varying adjudications, which would establish incompatible standards of conduct for the Defendants in this action or the prosecution of separate actions by individual members of the class would create the risk that adjudications with respect to individual members of the class would as a practical matter be dispositive of the interests of the other members not parties to the adjudications or substantially impair or impede their ability to protect their interests. Prosecution as a class action will eliminate the possibility of repetitious litigation.
56. Plaintiff does not anticipate any difficulty in the management of this litigation.
57. Defendants have acted or refused to act on grounds generally applicable to the class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the class as a whole.

**FIRST CLASS COUNT**  
**Fair Debt Collection Practices Act Violations**

58. Plaintiff, on behalf of herself and others similarly situated, repeats and realleges all prior allegations as if set forth at length herein.

59. Defendants violated 15 U.S.C. § 1692 et seq. of the FDCPA in connection with the complaints filed against Plaintiff and others similarly situated.

60. Defendants violated 15 U.S.C. § 1692e of the FDCPA by using a false, deceptive or misleading representation to collect the alleged debts from Plaintiff and others similarly situated.

61. Defendants violated various provisions of the FDCPA, including but not limited to, 15 U.S.C. § 1692e, 15 U.S.C. § 1692e(2)(A), 15 U.S.C. § 1692e(10) and 15 U.S.C. § 1692f(1).

62. Defendants violated various provisions of the FDCPA, including but not limited to, 15 U.S.C. § 1692e, 15 U.S.C. § 1692e(2)(A), 15 U.S.C. § 1692e(10) and 15 U.S.C. § 1692f(1).

63. Defendants violated 15 U.S.C. § 1692e(2)(A) of the FDCPA by falsely representing the character, amount or legal status of any alleged debt in to Plaintiff and others similarly situated.

64. Defendants violated 15 U.S.C. § 1692e(10) of the FDCPA by using a false representation or deceptive means to collect or attempt to collect a debt from Plaintiff and others similarly situated.

65. Defendants violated 15 U.S.C. § 1692f(1) by collecting or attempting to collect an amount from Plaintiff and others similarly situated that was not expressly authorized by the agreement creating the debt or permitted by law.

66. The complaints filed by Defendants would cause the members of the class, who are considered to be the least sophisticated consumers, to be confused, misled or deceived

regarding the character or legal status of the alleged debts in violation of 15 U.S.C. § 1692 et seq.

67. The violations of the FDCPA described herein constitute *per se* violations.

**SECOND CLASS COUNT**  
**New Jersey Consumer Fraud Act Violations**

68. Plaintiff, on behalf of herself and others similarly situated, repeats and realleges all prior allegations as if set forth at length herein.

69. Defendants' practice of purchasing defaulted consumer debts when it could not lawfully engage in that business is an unlawful act in violation of the Consumer Fraud Act (CFA) at N.J.S.A. 56:8-1, *et seq.*

70. Defendants' practice of filing collection lawsuits against consumers on debts that it purchased when it could not lawfully engage in that business is an unlawful act in violation of the Consumer Fraud Act (CFA) at N.J.S.A. 56:8-1, *et seq.*

71. Defendants' practice of attempting to collect a debt that it purchased when it could not lawfully engage in that business is an unlawful act in violation of the Consumer Fraud Act (CFA) at N.J.S.A. 56:8-1, *et seq.*

72. Defendants' practice of violating the FDCPA as set forth in the First Class Action Count is an unlawful act in violation of the Consumer Fraud Act (CFA) at N.J.S.A. 56:8-1, *et seq.*

73. Defendants' practice of purchasing defaulted consumer debts when it could not lawfully engage in that business is a misrepresentation, a deceptive commercial practice and/or unconscionable commercial practice in violation of the CFA at N.J.S.A. 56:8-2.

74. Defendants' practice of filing collection lawsuits against consumers on debts that it purchased when it could not lawfully engage in that business is a misrepresentation, a

deceptive commercial practice and/or unconscionable commercial practice in violation of the CFA at N.J.S.A. 56:8-2.

75. Defendants' practice of violating the FDCPA as set forth in the First Class Action Count is a misrepresentation, a deceptive commercial practice and/or unconscionable commercial practice in violation of the CFA at N.J.S.A. 56:8-2.

76. Plaintiff and all other persons similarly situated suffered an ascertainable loss including but not limited to the amount of the improper and unlawful debt that Defendants demanded from them in the lawsuits they filed against them.

### **THIRD CLASS COUNT**

#### **New Jersey Truth-in-Consumer Contract, Warranty and Notice Act Violations**

77. Plaintiff, on behalf of herself and others similarly situated, repeats and realleges all prior allegations as if set forth at length herein.

78. Plaintiff and those similarly situated are consumers pursuant to the Truth-in-Consumer Contract, Warranty & Notice Act (TCCWNA) N.J.S.A. § 56:12-14 et seq.

79. The lawsuits that HLO and/or Hudson filed against Plaintiff and those similarly situated are notices subject to TCCWNA N.J.S.A. § 56:12-14 et seq.

80. HLO and/or Hudson are creditors or assignees of creditors subject to the provisions of TCCWNA.

81. HLO and/or Hudson have violated TCCWNA at N.J.S.A. § 56:12-15 by filing lawsuits against Plaintiff and those similarly situated for debts that they could not lawfully collect in violation of the FDCPA as set forth in the First Class Action Count.

82. HLO and/or Hudson have violated TCCWNA at N.J.S.A. § 56:12-15 by filing lawsuits against Plaintiff and those similarly situated for debts that they could not lawfully collect in violation of the CFA as set forth in the Second Class Action Count.

WHEREFORE, Plaintiff, on behalf of herself and others similarly situated, demands judgment against the Defendants as follows:

A. For injunctive relief prohibiting Defendants from future violations of the FDCPA (15 U.S.C. § 1692 et seq.), CFA (N.J.S.A. 56:8-2 et seq.), TCCWNA (N.J.S.A. 56:12-14 et seq.) and Rules of Court as set forth herein and requiring Defendants to comply with these statutes and all applicable regulations;

B. For an injunction prohibiting HLO from buying or selling consumer debt.

C. For declaratory judgment that Defendants violated the FDCPA (15 U.S.C. § 1692 et seq.), CFA (N.J.S.A. 56:8-2 et seq.) and TCCWNA (N.J.S.A. 56:12-14 et seq.);

D. For certification of this matter as a class action, appointing the named Plaintiff as representative of the class, and appointing Andrew R. Wolf, Esq. of Galex Wolf, LLC and Christopher J. McGinn, Esq. of the Law Offices of Christopher J. McGinn as class counsel;

E. For maximum statutory damages under the FDCPA (15 U.S.C. § 1692 et seq.), CFA (N.J.S.A. 56:8-2 et seq.), TCCWNA (N.J.S.A. 56:12-14 et seq.) and all other applicable statutes;

F. For a refund of all money unlawfully collected from Plaintiff and any member of the class pursuant to the CFA at N.J.S.A. 56:8-2.11;

G. For reasonable attorneys' fees and costs of suit in connection with this action pursuant to 15 U.S.C. § 1692k(a)(3), N.J.S.A. 56:8-19, N.J.S.A. 56:12-17 and all other applicable statutes;

H. For pre-judgment and post-judgment interest; and

I. For such other and further relief as Plaintiff and others similarly situated may be entitled or as the Court deems equitable and just

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues subject to trial.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:5-4, Andrew R. Wolf, Esq. is hereby designated as trial counsel for the Plaintiff in the above matter.

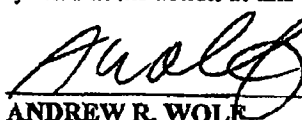
**NOTICE TO ATTORNEY GENERAL OF ACTION**

A copy of the complaint will be mailed to the Attorney General of the State of New Jersey within ten days after the filing with the Court, pursuant to N.J.S.A. § 56:8-20.

**CERTIFICATION**

Pursuant to R. 4:5-1, I hereby certify to the best of my knowledge that the matter in controversy is not the subject of any other action pending in any court or the subject of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated, except that the Defendants herein have filed a small claims collection lawsuit against the Plaintiff in the Monmouth County Law Division, Special Civil Part under Docket No. MON-SC-989-10 and Defendants have filed similar complaints against putative class members. Plaintiff has moved to transfer the small claims matter to the Law Division and consolidate it with this matter I further certify that I know of no party who should be joined in the action at this time.

Dated: May 11, 2010

  
ANDREW R. WOLF  
*Attorneys for Plaintiff and those similarly situated*



# EXHIBIT A

Appended to:  
CLASS ACTION COMPLAINT AND JURY DEMAND/  
Chulsky vs. Hudson Law Offices, P.C., et al./  
MON-L-TO BE SUPPLIED-10

## SMALL CLAIMS SUMMONS AND RETURN OF SERVICE

Plaintiff or Plaintiff's Attorney Information: **SUPERIOR COURT OF NEW JERSEY**  
**Name: Lauri A. Hudson, Esquire** **SPECIAL CIVIL PART**  
**Address: 900 Route 168, Suite C-2** **Morristown COUNTY**  
**Telephone: NJ 98412**  
**Phone: 956/228-7600** Docket Number: 3C 989-10  
 (to be provided by the court)

**Hudson Law Offices, P.C. Successor in Interest**  
**to First Bank of Delaware** Plaintiff

Civil Action  
 SUMMONS

versus  
**Marielle Chulski** Defendant

(Check one): ☒ Contract ☐ Tort

Defendant Information:  
**Name: Marielle Chulski**  
**Address: REDACTED**

Demand Amount: \$1,194.72  
 Filing/Service Fee: \$22.00  
 Attorney's Fees: \$48.16  
 TOTAL: \$1,264.88

Phone: REDACTED

YOU MUST APPEAR IN COURT ON THIS DATE AND TIME: 4-22-10  
 at 9:00 a.m., OR THE COURT MAY RULE AGAINST YOU.

REPORT TO: 307W

## RETURN OF SERVICE (For Court Use Only)

COURT OFFICER'S RETURN OF SERVICE  
 IF SERVED BY COURT OFFICER

Docket Number: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
 WM ☐ WF ☐ BM ☐ BF ☐ OTHER ☐ HT ☐ WT ☐ AGE ☐ MUSTACHE ☐  
 HEARD ☐ GLASSES ☐  
 NAME: \_\_\_\_\_ RELATIONSHIP: \_\_\_\_\_

Description of Premises: \_\_\_\_\_

I hereby certify the above to be true and accurate.

Court Officer

IF SERVED BY MAIL (For Court Use Only)

I, \_\_\_\_\_, hereby certify that on \_\_\_\_\_, I  
 mailed a copy of the within summons and complaint by regular and certified mail, return  
 receipt requested.

Employee Signature

OUR FILE NO. 8301077

**SMALL CLAIMS COMPLAINT (Contract, Security Deposit, Rent, or Tort)**  
**SUPERIOR COURT OF NEW JERSEY**  
**LAW DIVISION/SPECIAL CIVIL PART**

**Lauri A. Hudson, Esquire**  
**Attorney for Plaintiff**

**Address:** 200 Route 168, Suite C-2  
Turnersville, NJ 08012  
**Telephone No.:** 856/228-7600

**Address:** 71 Monument Park  
Freshfield, NJ 07728  
**Telephone No.:** 732/981-2054

**Monmouth County**

**From Plaintiff:**  
**Names**

**Hudson Law Office, P.C. Successor in Interest**  
**in First Bank of Delaware**

**Address:** 200 Route 168, Suite C-2  
Turnersville, NJ 08012  
**Telephone No.:** 856/228-7600

**To Defendant:**

**Name:**

**Marjorie Chulski**

**Address:** REDACTED

**Telephone No.:** REDACTED

**SMALL CLAIMS SECTION**

**CIVIL ACTION**  
**COMPLAINT**

**MAR 28 2010**

**Check One - See Instruction A for Proper Use**  
☒ **XX Contract** **MONMOUTH COUNTY**  
☐ **Security Deposit** **LAW DIVISION** **048**  
☐ **Rent**  
☐ **Personal Injury or Property Damage**  
**(other than motor vehicle)**

**COMPLAINT (See Instruction B for Form A)**

**Demand: \$ \$1,194.72 plus costs and statutory attorney fees.**

**Plaintiff says:** Plaintiff is a successor in interest to this credit card account first issued by First Bank of Delaware for a Continental Finance Mastercard (hereinafter referred to as the Original Creditor). The Original Creditor is in the business of providing credit cards to its customers and has given the Defendant a credit card for his/her use. The Original Creditor has therefore extended financing for the amount of the purchases made by the Defendant. The Defendant has agreed to pay certain fees and charges assessed for opening this credit card account. The Defendant agreed to pay, in the event of default, interest at the rate of 24.75% from the day of default on any outstanding sums due. The Defendant has defaulted by failing to pay the amount due on this credit card account. The amount that is due and outstanding is \$731.68, plus interest from the date of default of September 30, 2007 to the date of this complaint in the amount of \$463.04 for a total amount due of \$1,194.72. This is an outstanding bank account that is due and owing.

**(You may attach more sheets if you need to)**

**IMPORTANT:** Plaintiff and defendant must bring all witnesses, photos, and documents, and other evidence to the hearing. Subpoena forms are available at the Clerk's office to require the attendance of witnesses.

**Plaintiff will use an interpreter fluent in the \_\_\_\_\_ language at the hearing.**

**I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.**

**LAURI A. HUDSON**

**Lauri A. Hudson, Esquire**

**Lauri A. Hudson**

**Your Name Typed, Stamped or Printed**

**Dated:** March 18, 2010




**EXHIBIT A**

**BILL OF SALE**

The undersigned, CREDIT SOLUTIONS, CORP. ("Assignor") on and as of the date hereof hereby absolutely sells, transfers, assigns, sets-over, quitclaims and conveys to Hudson Law Offices, P.C., a New Jersey Professional Corporation ("Assignee") without recourse and without representations or warranties of any type, kind, character or nature, express or implied, all of Assignor's right, title and interest in and to each of the accounts identified in the Closing File attached hereto (the "Accounts"), together with the right to all principal, interest or other proceeds of any kind with respect to the Accounts remaining due and owing as of the Cut-Off Date applicable to such Accounts as set forth in the Purchase & Sale Agreement dated May 30, 2008, pursuant to which the Accounts are being sold (including but not limited to proceeds derived from the conversion, voluntary or involuntary, of any of the Loans into cash or other liquidated property).

Dated this 10th day of May, 2008.

**CREDIT SOLUTIONS CORP.**

By:   
Name: Michael A. Joffe  
Title: President/CEO  
Address: 9573 Chesapeake Dr., #100  
San Diego, CA 92123

MONTMOUTH COUNTY

Form B - Page 1



THE SUPERIOR COURT OF NEW JERSEY

Law Division, Special Civil Part

SMALL CLAIMS SUMMONS

**YOU ARE BEING SUED!**  
**IF YOU WANT THE COURT TO HEAR YOUR SIDE OF THIS CASE, YOU MUST APPEAR IN COURT. IF YOU DO NOT, THE COURT MAY RULE AGAINST YOU. READ ALL OF THIS PAGE AND THE NEXT PAGE FOR DETAILS.**

In the attached complaint, the person suing you (who is called the *plaintiff*) briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. You are cautioned that if you do not come to court on the trial date to answer the complaint, you may lose the case automatically, and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment and the judgment is valid for 20 years.

You can do one or more of the following things:

1. *Come to court to answer the complaint.* You do not have to file a written answer, but if you dispute the complaint and want the court to hear your side of the case, you must appear in court on the date and at the time noted on the next page.

AND/OR

2. *Resolve the dispute.* You may wish to contact the plaintiff's lawyer, or the plaintiff if the plaintiff does not have a lawyer, to resolve this dispute. You do not have to do this unless you want to. This may avoid the entry of a judgment and the plaintiff may agree to accept payment arrangements, which is something that cannot be forced by the court. You will have to appear in court on the trial date unless a written agreement is reached and filed with the court.

AND/OR

3. *Get a lawyer.* If you cannot afford to pay for a lawyer, free legal advice may be available by contacting Legal Services at 232-866-0020. If you can afford to pay a lawyer but do not know one, you may call the Lawyer Referral Services of your local county Bar Association at 232-431-5544.

If you need an interpreter or an accommodation for a disability, you must notify the court immediately.

La traducción al español se encuentra al dorso de esta página.

*Dawn Matern*

Clerk of the Special Civil Part

MONMOUTH COUNTY



EL TRIBUNAL SUPERIOR DE NUEVA JERSEY  
División de Derecho, Parte Civil Especial

NOTIFICACIÓN DE DEMANDA DE  
RECLAMACIONES MENORES

**¡LE ESTÁN HACIENDO JUICIO!**

SI UD. QUIERE QUE EL TRIBUNAL VEA SU VERSIÓN DE ESTA CAUSA TIENE QUE COMPARECER EN EL TRIBUNAL. SI NO COMPARECE, PUEDE SER QUE EL TRIBUNAL DICTAMINE EN SU CONTRA. PARA LOS DETALLES, LEA TODA ESTA PÁGINA Y LA QUE SIGUE.

En la demanda adjunta, la persona que le está haciendo juicio (que se llama *el demandante*) da al juez su versión breve de los hechos del caso y la suma de dinero que alega que Ud. le debe. Se le advierte que si Ud. no viene al tribunal en la fecha del juicio, es posible que pierda la causa automáticamente y el tribunal puede dar al demandante lo que pide más intereses y costas. Si se registra una decisión en contra de Ud., un Oficial de la Parte Civil (Special Civil Part Officer) puede embargar su dinero, salario o bienes muebles para pagar toda o parte de la adjudicación y la adjudicación tiene 20 años de vigencia.

Usted puede escoger entre las siguientes opciones:

1. *Venir al tribunal para contestar la demanda.* No hace falta que presente una contestación escrita, pero si Ud. disputa la demanda y quiere que el juez vea su versión de la causa, tiene que comparecer en el tribunal en la fecha y a la hora notadas en la página que sigue.

**ADEMÁS, O DE LO CONTRARIO, USTED PUEDE**

2. *Resolver la disputa.* Ud. posiblemente quiera comunicarse con el abogado del demandante, o el demandante si el demandante no tiene abogado, para resolver esta disputa. No tiene que hacerlo si no quiere. Esto puede evitar que se registre una adjudicación y puede ser que el demandante esté de acuerdo con aceptar un convenio de pago lo cual es algo que el juez no puede imponer. Tendrá que comparecer en el tribunal en la fecha del juicio a menos que se llegue a un acuerdo escrito que se registre en el tribunal.

**ADEMÁS, O DE LO CONTRARIO, USTED PUEDE**

3. *Consiguir un abogado.* Si Ud. no tiene dinero para pagar a un abogado, es posible que pueda recibir consejos legales gratuitos si se comunica con Servicios Legales (Legal Services) al 332-566-0020. Si tiene dinero para pagar a un abogado pero no conoce ninguno puede llamar a Servicios de Recomendación de Abogados (Lawyer Referral Services) del Colegio de Abogados (Bar Association) de su condado local al 332-431-5544.

Si necesita un intérprete o alguna acomodación por un impedimento, tiene que notificarlo inmediatamente al tribunal.

Andrew R. Wolf, Esq.  
Galex Wolf, LLC  
1520 U.S. Highway 130 - Suite 101  
North Brunswick, NJ 08902  
(732) 257-0550 - tel  
(732) 257-5654 - fax

Christopher J. McGinn  
The Law Office of Christopher J. McGinn  
P.O. Box 365  
79 Paterson St.  
New Brunswick, NJ 08901  
(732) 937-9400 - tel  
(800) 931-2408 - fax

Attorneys for Plaintiff Marjorie Chulsky on  
behalf of herself and those similarly situated

Marjorie Chulsky, on behalf of herself and  
those similarly situated,

Plaintiffs,

vs.

Civil Action

Hudson Law Offices, P.C.; Lauri A.  
Hudson a/k/a Lauri A. Hudson, Esq.; and  
John Does 1 to 10,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
MONMOUTH COUNTY - LAW DIVISION

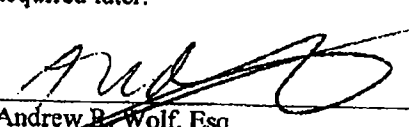
Docket No. MON-L-002424-10

**NOTICE TO PRODUCE DOCUMENTS  
ON HUDSON LAW OFFICES, P.C.**

To: Hudson Law Offices, P.C.  
900 Route 168, Suite C-2  
Turnersville, New Jersey 08012

Pursuant to Court Rules, Plaintiff requests that Defendant Hudson Law Offices, P.C. furnish the Documents described below to Plaintiff's attorneys, at the above addresses, on an ongoing basis, within the time period prescribed by the Rules. The obligation to produce is of a continuing nature and applies to Documents acquired later.

DATED: June 4, 2010

  
\_\_\_\_\_  
Andrew R. Wolf, Esq.  
Attorney for Marjorie Chulsky on behalf  
of herself and those similarly situated



GENERAL INSTRUCTIONS

1. YOU are to furnish all DOCUMENTS or things in YOUR possession, custody or control, regardless of whether such DOCUMENTS or materials are possessed directly by YOU or YOUR directors, offices, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by YOUR attorneys or their agents, employees, representatives or investigators.

2. In producing DOCUMENTS, YOU are requested to produce the original of each DOCUMENT requested, together with all non-identical copies and drafts of such DOCUMENT. If the original of any DOCUMENT cannot be located, a copy shall be produced in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.

3. If any requested DOCUMENT or thing cannot be produced in full, YOU are to produce it to the extent possible, indicating which DOCUMENT, or portion of such DOCUMENT, is being withheld, and the reason that DOCUMENT is being withheld.

4. DOCUMENTS not otherwise responsive to the following Requests for Production shall be produced if such DOCUMENTS mention, discuss, refer to, or explain the DOCUMENTS that are called for by these Requests, or if such DOCUMENTS are attached to DOCUMENTS called for by these Requests and constitute routing slips, transmittal memoranda, letters, cover sheets, comments, evaluations or similar materials.

5. All DOCUMENTS shall be produced in the same order as they are kept or maintained by YOU in the ordinary course of business.

6. All DOCUMENTS shall be produced in the file folder, envelope or other container in which the DOCUMENTS are kept or maintained by YOU. If, for any reason, the container cannot be produced, produce copies of all labels or other identifying marks.

7. DOCUMENTS shall be produced in such fashion as to identify the department, branch or office in whose possession they were located and, where applicable, the natural person in whose possession they were found and the business address of each DOCUMENT'S custodian(s). DOCUMENTS attached to each other should not be separated.

8. If any form of privilege, whether based on statute or otherwise, is claimed as a ground for not producing any DOCUMENT, or any part thereof, each and every fact upon which the privilege is based, including sufficient facts for the Court to make a full determination whether the claim of privilege is valid, shall be set forth in complete detail. With respect to a DOCUMENT to which a privilege is being claimed, the following information at the very minimum should be provided:

- (a) date;
- (b) author;
- (c) names and addresses of any persons who receive copies, if any;

- (d) title;
- (e) type of tangible thing, letter, memorandum, telegram, report, etc.; and
- (f) general description of the subject matter (without revealing privileged information).

9. If any of the DOCUMENTS referred to in response the following Requests for Production have been lost, destroyed, removed from YOUR files or altered in any manner after the DOCUMENT was initially made, taken or prepared, provide the following information:

- (a) a description of the DOCUMENT
- (b) the date of each such occurrence;
- (c) a description of each such occurrence, including the nature of each alteration and the circumstances of the loss, destruction or removal;
- (d) the reason for each such occurrence;
- (e) the name, address and job title of the persons who took such action;
- (f) the name, address and job title of the persons who authorized, directed or acknowledged the action at the time it was taken; and
- (g) whether there has been any attempt to produce, duplicate or find a copy of any lost, destroyed, or originally unaltered DOCUMENTS, and, if so, a description of the attempt and its result.

10. Except as otherwise provided, these Requests for Production of shall be deemed to be continuing and any information or DOCUMENTS relating in any way to these Requests for Production which YOU acquire, which become known to YOU up to and including the time of trial, shall be furnished by YOU to Plaintiff within a reasonable time after such information is acquired or becomes known. Similarly, any information or DOCUMENTS provided in response to these Requests for Production which is later found to be incomplete or incorrect, or to have become incomplete or incorrect because of changed circumstances should be completed or corrected by means of supplemental responses.

11. The past tense of a verb includes the present and the present tense includes the past where the clear meaning is not distorted by the change of tense.

12. The plural of any word includes the singular, and the singular includes the plural.

#### DEFINITIONS

1. The term "CONCERNING" or "CONCERN" means prepared, made, obtained, received, transmitted in connection with, evidencing, referring to, pertaining to, alluding to, relating to,

connected with, commenting upon, in respect of, about, regarding, discussing, reflecting, analyzing, explaining, evaluating, summarizing, describing, touching upon, constituting, sent to, served upon, mailed, delivered to, or referencing in any way.

2. "ALL" means all or any, and the term "any" means any or all.
3. The term "YOU" or "YOUR" means Defendant Hudson Law Offices, P.C. and any of its attorneys, partners, members, subsidiaries, divisions, subdivisions, affiliates, predecessors, successors, joint ventures, board of directors or committees thereof, present and former officers, directors, representatives, AGENTS and all other PERSONS acting or purporting to act on its behalf.
4. "PERSON" means a natural person, a group of natural persons acting as individuals, a group of natural persons acting in a collegial capacity (e.g., as a committee (board of directors), a corporation, partnership, proprietorship, joint venture, firm, association, government or government agency and/or any other business, government or social entity, and any employee or agent thereof).
5. The term "DOCUMENT" means any and all tangible things upon which any expression, communication or representation is reflected or has been recorded by any means including, but not limited to, handwriting, typewriting, printing, photostating, photographing, magnetic impulse, or mechanical, phonic or electronic recording, computerized data whether on disk, hard drive or otherwise, and any nonidentical copies (whether different from the original because of notes made on such copies, because of indications that the copies were sent to different individuals than were the originals, or any other reason), including but not limited to abstracts, agreements, analyses, blueprints, books, brochures, circulars, compilations, consultants' reports or studies, contracts, databases, files, graphs, insurance policies, letters, lists, manuals, maps, notebooks, opinions, pamphlets, papers, pictures, plans, projections, press releases or clippings, publications, reports, working papers, preliminary, intermediate or final drafts, correspondence, memoranda, charts, notes, minutes or records of any sort of meeting, invoices, financial statements, financial calculations, diaries, reports of telephone or other oral conversations, telephone message slips, desk calendars, appointment books, computer tapes, computer disks, computer printouts, computer cards, electronically stored data, and all other writings and recordings of any kind.
6. "DEBT" means any obligation or alleged obligation of a CONSUMER to pay money arising out of a transaction in which the money, property, insurance, or services which are the subject of the transaction are primarily for personal, family, or household purposes, whether or not such obligation has been reduced to judgment.
7. "INITIAL LETTER" means the first written communication sent by YOU or on YOUR behalf.
8. "CONSUMER" means any natural PERSON obligated or allegedly obligated to pay any DEBT. "CONSUMERS" is the plural of "CONSUMER."

9. "MEMBER OF THE CLASS" means all CONSUMERS with a New Jersey address a) against whom YOU filed a complaint against on behalf of Hudson Law Offices, P.C. on or after May 13, 2010 and/or b) from whom YOU attempted to collect a debt owned by Hudson Law Offices, P.C. on or after May 13, 2010.
10. "CLASS PERIOD" means the period from May 13, 2010 through the present.
11. "NET WORTH" means the total of all of your assets (stocks, bonds, bank accounts, real estate, property, business receivables, notes receivable, etc.) minus the total of your liabilities (outstanding loans owed, credit card balances, taxes payable, bills payable, etc.).
12. "ATTEMPTED" or "ATTEMPTING" as used herein means to make an effort to do or accomplish.

#### DOCUMENTS TO BE PRODUCED

1. ALL DOCUMENTS CONCERNING any DEBT allegedly owed by Plaintiff to Hudson Law Offices, P.C. at any time during the Class Period.
2. ALL DOCUMENTS CONCERNING any effort on behalf of Hudson Law Offices, P.C. by YOU to collect a DEBT from Plaintiff at any time during the Class Period.
3. ALL DOCUMENTS CONCERNING any lawsuit filed by YOU on behalf of Hudson Law Offices, P.C. against Plaintiff filed at any time during the Class Period, including but not limited to any complaint, summons, motion, correspondence, or pleading.
4. The complete collection file(s) of Plaintiff, including but limited to any document signed by Plaintiff, computer files, digital files and physical files, maintained by YOU CONCERNING the Plaintiff or any debt allegedly owed by Plaintiff to YOU, including but not limited to ALL DOCUMENTS, including but not limited to notes of contacts or communications, copies of collection letters, copies of checks or other payments, collection logs, accounts, ledgers, applications, any recording of communication between Plaintiff and YOU, and interview forms.
5. ALL DOCUMENTS that YOU sent to or received from Plaintiff or her agents.
6. A complete statement of account that YOU attempted to collect from Plaintiff.
7. ALL e-mail and voicemail messages whether in electronic or paper form CONCERNING Plaintiff, the factual allegations of her Complaint, or the above captioned matter.
8. ALL DOCUMENTS CONCERNING any DEBT allegedly owed by any MEMBER OF THE CLASS to Hudson Law Offices, P.C. at any time during the Class Period.
9. ALL DOCUMENTS CONCERNING any effort on behalf of Hudson Law Offices, P.C. by YOU to collect a DEBT from MEMBER OF THE CLASS at any time during the Class Period.

10. ALL DOCUMENTS CONCERNING any lawsuit filed by YOU on behalf of Hudson Law Offices, P.C. against any MEMBER OF THE CLASS filed at any time during the Class Period, including but not limited to any complaint, summons, motion, correspondence, or pleading.
11. The complete collection file(s) of each MEMBER OF THE CLASS, including but limited to any document signed by the MEMBER OF THE CLASS, computer files, digital files and physical files, maintained by YOU CONCERNING the Plaintiff or any debt allegedly owed by Plaintiff to YOU, including but not limited to ALL DOCUMENTS, including but not limited to notes of contacts or communications, copies of collection letters, copies of checks or other payments, collection logs, accounts, ledgers, applications, any recording of communication between the MEMBER OF THE CLASS and YOU, and interview forms.
12. ALL DOCUMENTS that YOU sent to or received from any MEMBER OF THE CLASS.
13. A complete statement of account that YOU attempted to collect from any MEMBER OF THE CLASS.
14. ALL e-mail and voicemail messages whether in electronic or paper form CONCERNING any MEMBER OF THE CLASS.
15. ALL DOCUMENTS exchanged between any creditor and YOU CONCERNING any account purchased by YOU at any time during the CLASS PERIOD where any Class Member was an obligor on that account.
16. ALL DOCUMENTS CONCERNING ALL payments that YOU received from any CLASS MEMBER at any time during the CLASS PERIOD CONCERNING any debt owned by YOU.
17. ALL executed contracts and/or agreements between YOU and any creditor CONCERNING any debt that YOU attempted to collect on behalf of Hudson Law Offices, P.C. at any time during the CLASS PERIOD.
18. ALL DOCUMENTS that you received from or sent to a creditor related to any DEBT allegedly owed to YOU by any MEMBER OF THE CLASS during the CLASS PERIOD.
19. ALL DOCUMENTS that you received from or sent to any third party CONCERNING the subject matter of Plaintiff's Complaint.
20. ALL periodic statements of account issued by the original creditor and/or subsequent creditor CONCERNING the DEBT allegedly owed by Plaintiff.
21. ALL periodic statements of account issued by the original creditor and/or subsequent creditor CONCERNING the DEBT allegedly owed by any MEMBERS OF THE CLASS during the CLASS PERIOD.
22. ALL DOCUMENTS CONCERNING the allegations of the complaint.

23. ALL DOCUMENTS relied upon or referred to by YOU in preparing YOUR response to Plaintiff's Complaint.
24. ALL DOCUMENTS, charts or physical objects that YOU will and/or intends to introduce into evidence at the time of trial.
25. ALL insurance policies insuring YOU for violations of the Fair Debt Collection Practices Act in effect at any time since January 1, 2009.
26. Copies of ALL policy manuals and instructions provided by YOU to employees or agents regarding collection practices or procedures in effect since January 1, 2009.
27. All DOCUMENTS CONCERNING the formation of Hudson Law Offices, P.C. as a professional cooperation, including but not limited to any document filed with the New Jersey Secretary of State.
28. ALL DOCUMENTS that in any way document, describe, prove, explain or otherwise evidence the NET WORTH of Hudson Law Offices, P.C.
29. ALL federal and state income tax returns filed by Hudson Law Offices, P.C. since January 1, 2009.
30. ALL financial reports and statements provided to the investors of Hudson Law Offices, P.C. since January 1, 2009.
31. The most recent financial statement issued, or given to any third party, by the Defendant since January 1, 2006.
32. ALL expert reports regarding this matter.
33. ALL DOCUMENTS containing the names and addresses of ALL individuals contacted as potential witnesses, expert or otherwise, to testify at trial.
34. ALL curriculum vitae of ALL individuals contacted as potential expert witnesses.
35. ALL DOCUMENTS CONCERNING any litigation filed against the Defendant alleging violations of the Fair Debt Collection Practices Act that were filed against Defendant since January 1, 2008.



# CIVIL COVER SHEET

The JS - 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings of other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

## I.(a) PLAINTIFFS

Marjorie Chulsky, on behalf of herself and those similarly situated

## DEFENDANTS

Hudson Law Offices, P.C.; and Lauri A. Hudson a/k/a Lauri A. Hudson, Esq.; and John Does 1-10

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Resident of Pennsylvania  
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

## (c) ATTORNEYS (FIRM NAME, ADDRESS AND TELEPHONE NUMBER)

Christopher J. McGinn, Esquire  
The Law Office of Christopher J. McGinn  
79 Paterson Street  
New Brunswick, NJ 08901  
Phone: 732-937-9400

Andrew R. Wolf, Esq.  
Galex, Wolf, LLC  
1520 U.S. Highway 130, Suite 101  
North Brunswick, NJ 08902  
Phone: 732-257-0550

## ATTORNEYS (IF KNOWN)

John L. Slimm, Esquire  
Marshall, Dennehey, Warner, Coleman & Goggin  
200 Lake Drive East, Suite 300, Cherry Hill, NJ 08002  
Phone: 856-414-6000

## II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- |                                         | PTF                        | DEF                        |                                                               | PTF                        | DEF                        |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| Citizen of this State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation                                                | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal - Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights <b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>HABEAS CORPUS:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Arts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input checked="" type="checkbox"/> 890 Other Statutory Actions

## V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 Original Proceeding  
☒ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Fair Debt Collection Practices Act, 15 U.S.C. §1692, et seq.

## VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION  
☐ UNDER F.R.C.P. 23 Declaratory Relief

## DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND ☒ YES ☐ NO

**Viii. RELATED CASE(S)** (See instructions)

**IF ANY**

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

June 16, 2010

SIGNATURE OF ATTORNEY OF RECORD

*/s/ John L. Stimm*

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_

AMOUNT \_\_\_\_\_

APPLYING IFP \_\_\_\_\_

JUDGE \_\_\_\_\_

MAG JUDGE \_\_\_\_\_



08002-00224-JLS

MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN

By: John L. Slimm, Esquire ([JLSlimm@mdwecg.com](mailto:JLSlimm@mdwecg.com))

Woodland Falls Corporate Park

200 Lake Drive East, Suite 300

Cherry Hill, NJ 08002

856-414-6000

Attorney for Defendants, Hudson Law Offices, P.C.; and Lauri A. Hudson a/k/a Lauri A. Hudson, Esq.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(CAMDEN VICINAGE)**

MARJORIE CHULSKY, on behalf of herself  
and those similarly situated,

Plaintiff,

vs.

HUDSON LAW OFFICES, P.C.; LAURI A.  
HUDSON a/k/a LAURI A. HUDSON, ESQ.;  
and JOHN DOES 1-10,

Defendants.

CIVIL ACTION NO:

**CERTIFICATE OF FILING/SERVICE**

The original of the within Notice of Filing and Notice of Removal by defendants, Hudson Law Offices, P.C.; and Lauri A. Hudson a/k/a Lauri A. Hudson, Esq., have been e-filed with the Clerk of the Court, United States District Court for the District of New Jersey, Camden Vicinage.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN  
Attorneys for Defendants, Hudson Law Offices,  
P.C.; and Lauri A. Hudson a/k/a Lauri A. Hudson,  
Esq.

BY: /s/ John L. Slimm

JOHN L. SLIMM

DATED: June 16, 2010

**PROOF OF SERVICE**

On June 16, 2010, I, the undersigned, served via New Jersey Lawyers

Service to:

Jennifer M. Perez, Clerk  
Superior Court of New Jersey  
Law Division, Hughes Justice Complex  
25 W. Market Street, CN 971  
Trenton, NJ 08625

Clerk of the Court, Civil Part  
Monmouth County Superior Court  
71 Monument Park  
P.O. Box 1266  
Freehold, NJ 07728-1266

Christopher J. McGinn, Esquire  
The Law Offices of Christopher J. McGinn  
79 Paterson Street, P.O. Box 365  
New Brunswick, NJ 08901-0365  
Attorney for Plaintiff, Marjorie Chulsky, on behalf of herself and  
those similarly situated

Andrew R. Wolf, Esq.  
Galex, Wolf, LLC  
1520 U.S. Highway 130, Suite 101  
North Brunswick, NJ 08902  
Attorney for Plaintiff, Marjorie Chulsky, on behalf of herself and  
those similarly situated

the following: **Notice of Filing and Notice of Removal**

I certify that the foregoing statements made by me are true. I am aware that if any of the  
foregoing statements made by me are willfully false, I am subject to punishment.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN  
Attorneys for Defendants, Hudson Law Offices,  
P.C.; and Lauri A. Hudson a/k/a Lauri A. Hudson,  
Esq.

DATED: June 16, 2010

BY: /s/ John L. Slimm  
JOHN L. SLIMM

08002-00224-JLS

MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN

By: John L. Slimm, Esquire ([JLSlimm@mdwcg.com](mailto:JLSlimm@mdwcg.com))

Woodland Falls Corporate Park

200 Lake Drive East, Suite 300

Cherry Hill, NJ 08002

856-414-6000

Attorney for Defendants, Hudson Law Offices, P.C.; and Lauri A. Hudson a/k/a Lauri A. Hudson, Esq.

MARJORIE CHULSKY, on behalf of herself  
and those similarly situated,

Plaintiff,

vs.

HUDSON LAW OFFICES, P.C.; LAURI A.  
HUDSON a/k/a LAURI A. HUDSON, ESQ.;  
and JOHN DOES 1-10,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MONMOUTH COUNTY

DOCKET NO.: L-2424-10

CIVIL ACTION

**PROOF OF SERVICE/MAILING**

The original and one (1) copy of the within Notice of Notice of Removal has been filed  
with the Clerk of the Monmouth County Superior Court, in Freehold, New Jersey.

MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN

Attorney for Defendants, Hudson Law  
Offices, P.C.; and Lauri A. Hudson a/k/a  
Lauri A. Hudson, Esq.

Dated: June 16, 2010

By



JOHN L. SLIMM

**PROOF OF MAILING**

On June 16, 2010, the undersigned, arranged for service via NJ

Lawyers Service to:

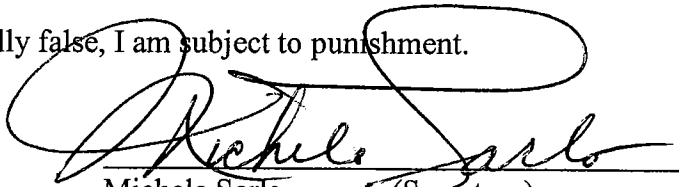
Christopher J. McGinn, Esquire  
The Law Office of Christopher J. McGinn  
79 Paterson Street, P.O. Box 365  
New Brunswick, NJ 08901-0365  
Attorney for Plaintiff, Marjorie Chulsky, on behalf of herself and  
those similarly situated

Andrew R. Wolf, Esq.  
Galex, Wolf, LLC  
1520 U.S. Highway 130, Suite 101  
North Brunswick, NJ 08902  
Attorney for Plaintiff, Marjorie Chulsky, on behalf of herself and  
those similarly situated

Jennifer M. Perez, Clerk  
Superior Court of New Jersey  
Law Division, Hughes Justice Complex  
25 W. Market Street, CN 971  
Trenton, NJ 08625

The following: **Notice of Notice of Removal**

I certify that the foregoing statements made by me are true. I am aware that if any of the  
foregoing statements made by me are willfully false, I am subject to punishment.

  
Michele Sarlo (Secretary)